



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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OFFICE OF THE
REGIONAL ADMINISTRATOR

December 27, 2010

David Drozd, Director
BRAC Program Management Office Northeast
Attn: Brunswick EIS
4911 Broad Street, Building 679
Philadelphia, PA 19112-1303

Re: Final Environmental Impact Statement for the Disposal and Reuse of Naval Air
Station Brunswick, Maine (CEQ#20100451)

Dear Mr. Drozd:

The Environmental Protection Agency-New England Region (EPA) has reviewed the Department of the Navy's Final Environmental Impact Statement (FEIS) for the disposal and reuse of Naval Air Station (NAS) Brunswick in Brunswick, Maine. Based on our review it appears that the project alternatives and associated impacts expected from closure of NAS Brunswick in the FEIS are consistent with those described in the DEIS. This letter provides our comments on the FEIS in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

EPA's comments on the DEIS requested that the Navy address deficiencies and concerns related to the characterization of indirect/secondary impacts and wetland, water quality and air issues. We appreciate the time the Navy spent discussing our DEIS comments in a conference call following the close of the comment period. We also acknowledge the FEIS response to our comments on cumulative impacts, wetland delineation, and the status of Record of Decision for the Eastern Plume. We have no further comment regarding those issues.

We are pleased to see included in the FEIS an analysis of projected off-base indirect impacts, which was missing from the DEIS. We do, however, have concerns regarding the characterization of indirect impacts as insignificant, and do not believe that Appendix N or Chapter 4 fully explain the basis for this conclusion. The FEIS indicates that an additional 2,071 jobs are likely to be induced *off* the base by redevelopment *on* the base under Alternative 1 and 2,934 jobs under Alternative 2. These increases in employment will be associated with increases in population, as described in the FEIS, with some of the growth occurring within the Brunswick Labor Market Area, and the remainder outside. What matters in terms of environmental impacts is where that growth occurs and what natural resources will be impacted. We recognize that the region around the base

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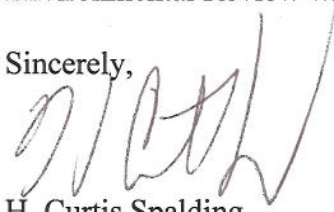
will continue to grow over the next 20 years, and that this induced growth is only a portion of overall growth, but believe the FEIS should have more fully explained why the induced growth is considered not to be significant in terms of environmental impacts.

Moreover, we continue to believe that the Navy can and should do more to condition the transfer of the base to prevent or mitigate impacts of the redevelopment related to stormwater, energy efficiency and the control of emissions during construction. With respect to the control of stormwater, the FEIS notes that the requirements of the "EISA [Energy Independence & Security Act] would not apply to this action based upon the act of transferring NAS Brunswick out of federal ownership." While technically this may be true, the redevelopment and its impacts, such as potential stormwater impacts, would not occur without the transfer of the land. Therefore we continue to believe the Navy has an obligation under NEPA to work with the redevelopment authority to develop conditions for the land after the transfer that require implementation of the EISA requirements (as detailed in our comments on the DEIS). The FEIS also generally indicates that the Community Design Guidelines can be implemented by the Midcoast Regional Redevelopment Authority (MRRA) for the redevelopment to address project related emissions, energy efficiency, and construction period emissions. These guidelines are helpful, but they are not requirements, and because they are locally controlled there is no guarantee that they will specifically address impacts after the property is transferred. Again, we believe the land transfer should be conditioned to include mechanisms focused on the environmental performance of the redevelopment.

In conclusion, we recommend that the Record of Decision for the project explain how the Navy will condition the transfer of the base property to address stormwater flows (to demonstrate consistency with Section 438 of EISA), energy efficiency measures (like the Energy Star and LEED programs listed in the FEIS), and construction period emissions.

Thank you for the opportunity to comment on the FEIS for the disposal and reuse of NAS Brunswick. Please contact Timothy Timmermann (617-918-1025) of EPA's Office of Environmental Review with any comments or questions about this letter.

Sincerely,



H. Curtis Spalding
Regional Administrator